

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

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**IN RE: TOYOTA MOTOR CORP.**

**Case No.: 8:10ML2151 JVS  
(FMOX)**

**UNINTENDED ACCELERATION**

**MARKETING, SALES, PRACTICES,**

**Application For Appointment**

**AND PRODUCTS LIABILITY LITIGATION**

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ANITA MAGDALENA JASKOT, an attorney duly admitted to practice in the State of New York, the United States District Courts for the Eastern and Southern District of New York, and, by this Court's Order, dated April 14, 2010 (the "Order"), in the United States District Court for the Central District of California, hereby respectfully submits this application pursuant to the Order to be a member of the Economic Loss Plaintiff's Counsel Committee in MDL No. 2151.

On February 11, 2010, I filed the case entitled *Sander v. Toyota Motor Sales, USA, Inc., et. al*; in the United States District Court, Southern District of New York (Docket No.: 10 CV 1111). As a preliminary matter, I hereby represent that I (i) have knowledge and experience in prosecuting complex litigation, including class actions; (ii) am able, willing, and eager to commit to the time that will be required to litigate the issues to completion in the Toyota litigation; (iii) have the experience and ability to work constructively, civilly, and cooperatively with others; and (iv) have access to sufficient resources to prosecute the claims of the plaintiffs in this action.<sup>1</sup> I have been

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<sup>1</sup> I am also familiar with the Manual for Complex Litigation, Fourth, and have reviewed the Local Rules for the Central District of California, and the General Orders 08-02 (electronic filing) and 08-11 (electronic filing), as per the Court's Order.

working diligently over the past several months with respect to issues relating to this Toyota case, including participating in calls with other plaintiffs' counsel throughout the nation and reviewing various materials relating to substantive issues in this case.

As background, I have been practicing law in New York City for ten years. In my daily practice at the Law Offices of Robert M. Brill, LLC, I am involved in briefing and arguing complex commercial motions in state and federal courts, regularly attending pretrial, pre-motion and compliance conferences with the Court, attending arbitration proceedings before the American Arbitration Association, engaging in all levels of pre-trial discovery, including electronic discovery, interfacing daily with New York City governmental agencies concerning regulatory issues for business clients, and advising Board of Directors with respect to corporate governance matters.

I personally take and defend depositions, and am involved with numerous complex cases, on behalf of both plaintiffs and defendants, in which I prepare complex briefs, perform discovery, and work with experts. My firm has represented defendants and plaintiffs in state and federal litigation involving civil rights, fraudulent business and trade practices, telecommunications issues, administrative and regulatory matters, and intellectual property rights. My firm has the resources and work ethic to handle this litigation to completion.

I was born in Canada, speak fluent Polish, and have a working knowledge of French. I have traveled in numerous countries throughout the world and am well versed in international relations. In this regard, I am not married and would be able to travel without any commitments for purposes of discovery in countries such as Japan.

I am honored to have worked with some of the best lawyers in the United States and

continue to do so. This includes Daniel E. Becnel, Jr., Esq., of the Becnel Law Firm, with whom my firm is co-counsel in the multi-district litigation *In Re: Apple iPhone 3G and 3GS "MMS" Marketing and Sales Practices Litigation*; MDL No.: 2116. I am currently involved in only one multi-district litigation; namely, the Apple iPhone MDL, therefore, do not have a burdensome caseload which would impair my ability and commitment to the Toyota litigation.

While my experience in multi-district litigation is not as extensive as many of the other plaintiffs' lawyers, I respectfully submit that I have more than sufficient experience in extensive complex litigation, and that my willingness and energy to work diligently as a committee member would be a great asset to the committee team. It would be a great honor and learning experience for me to be a committee member in this litigation and to work with such fine plaintiffs' lawyers around the country. My understanding is that there are not many young female attorneys involved in this multi-district litigation (or MDL litigations in general). Most of the attorneys are male and have been practicing multi-district litigation for over thirty years. Therefore, I believe a fresh female mind to the male-dominated committee would be beneficial and reflective of the purpose of the Manual on Multi District Litigation, which suggests committees comprising of diverse talent and experience in order to facilitate economical and cooperative efforts in multi-district litigation.

By way of family background, my father, Dr. Thomas P. Jaskot is a physician practicing general medicine in Hamilton, Ontario, Canada. My mother is the manager of his medical practice. Both of my parents immigrated to Canada from Poland in the 1960s. My sister and I passed the New York State bar exam together in 2000. She now works as the managing attorney at Jaffe

& Koumourdas LLP, a law firm in New York City specializing in insurance defense for companies such as Countrywide Insurance.

I have attached hereto as Exhibit A a copy of my Curriculum Vitae. I humbly ask for an appointment by this Honorable Court in this interesting and complex case. I believe I would be an asset to the Economic Loss Plaintiff's Counsel Committee in working hard with other members to resolve this litigation as expeditiously as possible, in providing communication to the Court of our progress with the litigation, and working together with committee members to accomplish the goals of the litigation for the entire group of plaintiffs.

I am committed to devoting substantial time and resources to working with other plaintiffs' counsel on the Economic Loss Lead Counsel Committee, and respectfully pray that this Court appoint me to the Economic Loss Lead Counsel Committee.

Dated: New York, New York

April 27, 2010

Respectfully submitted,

s/ Anita M. Jaskot (NY Bar #: AJ6613)

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